

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
)	
vs.)	No. 08 CR 140
)	Honorable Robert W. Gettleman
)	
MARIA AVILA,)	
Defendant.)	

**DEFENDANT MARIA AVILA’S MOTION FOR EXTENSION
OF TIME WITHIN WHICH TO FILE ADDITIONAL PRETRIAL MOTIONS**

Now comes Defendant Maria Avila, by her attorney, Linda Amdur, pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure and the Due Process Clause and the Effective Assistance Clauses of the Fifth and Sixth Amendments to the United States Constitution, and respectfully moves this Court for an extension of time within which to file additional pretrial motions. In support of this Motion, the following is offered:

1. On March 13, 2008, Ms. Avila was charged in Count One of the indictment with conspiracy to possess with intent to distribute and to distribute in excess of five kilograms of powder cocaine, in violation of 21 USC § 846.
2. Pursuant to pretrial discovery, the government has tendered one DVD containing audio and video recordings of meetings on October 2006, October 2007, and February 2008. The DVD also contains recordings of hundreds of telephone conversations from September 2006 through February 2008. Additionally, surveillance reports and other records and documents pertaining to the charged offense have been provided. On April 16, 2008, the government

provided three CDs containing further audio and video recordings.

3. Ms. Avila speaks primarily Spanish and all discussions with her must be through an interpreter. On March 31, 2008, Ms. Avila was injured in a vehicular accident and was unable to come to Chicago for scheduled meeting to review evidence and case with counsel.

4. Undersigned counsel has had inadequate time to review all discovery and to discuss the evidence with Ms. Avila.

Wherefore, Defendant Maria Avila, by her attorney, Linda Amdur, requests extension of time within which to file additional pretrial motions.

Respectfully submitted,

S/Linda Amdur
Linda Amdur, Attorney for
Defendant Maria Avila

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic case Filing (ECF), Defendant Maria Avila's Motion For Extension of Time Within Which To File Additional Pretrial Motions was filed and served pursuant to the district court's ECF system as to ECF filers on April 28, 2008.

Respectfully submitted,

S/Linda Amdur
Linda Amdur, Attorney for
Defendant Maria Avila

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